

## EU WEBSITE DATA PROTECTION NOTICE

### 1. PURPOSE AND SCOPE OF NOTICE

The website, <https://corporatefitnessworks.com>, (our “**Website**”), is operated by Corporate Fitness Works, Inc. 1200 16th Street North, St. Petersburg, Florida 33705 (the “**CFW**” or “**Company**” or “**we**” or “**us**”).

This Data Protection Notice is intended to explain to our visitors (referred to as “**you**” or “**your**”) how your Personal Data will be handled by CFW and sets out the basis on which we use, process, store or disclose any information including the personal information detailed below relating to your (“**Personal Data**”) that we collect from you or that you provide to us through the Website. The Personal Data provided by you will be held by CFW as a controller.

This notice, and our Cookies Policy [here] applies to your use of the Website. We are not responsible for the content or privacy policies of other websites. Please note that we have an additional CFW Privacy Policy specific to users residing in the US at the following link [here]. We also have an additional Service User Data Protection Notice which applies when you access or use any of our services, and this can be accessed at the following link [here].

### 2. YOUR PERSONAL DATA COLLECTED AND OBTAINED

**IMPORTANT:** Please note that the below list of Personal Data we may collect about you, while intended to be as complete and accurate as reasonably possible, may be updated from time to time in accordance with section 10 of this Notice.

We may collect and process some or all of the following personal data about you:

Personal Data	Details
Usage and Device Data	<p>This may include information about your visit to the Website, including the full Uniform Resource Locators (URL), clickstream to, through and from the Website (including data and time), publications, services or other products you viewed or searched for, page response times, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page and linked websites that you can access through the Website (“<b>Linked Websites</b>”).</p> <p>Most of this Personal Data is collected using cookies on the Website. Please see our Cookies Policy for more information about how the Website uses cookies.</p>
Technical Data	<p>When using the Website, personal information is collected from you by CFW. This may include information about your device browser including your IP address, browser and type of version, time zone setting, browser plug-in types and versions and operating system and platform.</p>

You can choose to provide us with the following Personal Data:

Personal Data	Details
Identity Data	You may choose to give us additional information such as your first name, last name, e-mail address, company/employer details, phone number, address, job title, contact, and other details when contacting us and submitting enquiries through the Website.

### 3. HOW AND WHY WE PROCESS YOUR PERSONAL DATA

The following table details the **legal bases** on and **purposes** for which we collect and process your Personal Data:

Legal Basis	Purpose(s)
<p><b>Legitimate Interests</b></p> <p>It is necessary for the purpose of our legitimate interests to collect and process this Personal Data.</p>	<p><b>Access to the Website</b></p> <ul style="list-style-type: none"> <li>To allow customers access to the information on the Website;</li> </ul> <p><b>Improving Website Functionality &amp; Efficiency</b></p> <ul style="list-style-type: none"> <li>To provide, improve, test and monitor the effectiveness of the Website;</li> <li>To monitor metrics such as total number of visitors, traffic data and demographic patterns; and</li> <li>To send and receive information by email related to service delivery;</li> </ul> <p><b>Responding to queries</b></p> <ul style="list-style-type: none"> <li>To process and respond to any enquiries or requests such as customer support you submit to us by email or through our Contact page.</li> </ul> <p><b>Promotional or Marketing materials</b></p> <ul style="list-style-type: none"> <li>To provide you with information in relation about our events programme, general news from CFW, signing up to receive discounts, the promotion of our services, and other communications from CFW deemed to be of probable interest.</li> </ul>
<p><b>IMPORTANT:</b> Before we process your Personal Data to pursue our legitimate interests for the above purposes, we determine if such processing is necessary and we carefully consider the impact of our processing activities on your fundamental rights and freedoms. On balance, we have determined that such processing is necessary for our legitimate interests and that the processing which we conduct does not adversely impact on these rights and freedoms.</p>	

Legal Basis	Purpose(s)
<p><b>Consent</b></p> <p>Generally, we do not rely on consent as a legal basis for processing your personal data. However, where we conduct any direct marketing activities in the EU, we will obtain your consent.</p> <p><b>You have the right to withdraw consent to marketing by contacting us at any time.</b></p>	<p><b>Third Party Direct Marketing</b></p> <ul style="list-style-type: none"> <li>• Subject to receiving your consent, we may send direct marketing communications to you via email.</li> </ul>
<p><b>Compliance with Legal Obligation</b></p> <p>It is necessary for us to collect and process your Personal Data in order to comply with the legal obligations imposed on us under applicable law.</p>	<ul style="list-style-type: none"> <li>• To comply with European Union and local EU laws.</li> </ul>
<p><b>To Defend a Legal Claim</b></p> <p>It is necessary for us to collect and process your Personal Data to investigate, establish, exercise or defend legal claims</p>	<ul style="list-style-type: none"> <li>• To file legal proceedings;</li> <li>• To investigate, establish, exercise or defend a legal claim; and</li> <li>• To settle legal claims.</li> </ul>

We will only use your Personal Data for the purposes for which we collect it (as outlined in this section 3), unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you in accordance with section 10 of this Notice and we will explain the legal basis which allows us to do so.

#### 4. AUTOMATED PROCESSING

We do not use automated decision making, such as profiling, to process your personal data.

#### 5. LINKED WEBSITES

Our Website may link to the websites of other companies or organizations not affiliated with or controlled by us, including social media channels such as Twitter and LinkedIn and some content or applications on our Website are served by third parties. CFW is not responsible for the privacy notices or practices on Linked Websites. These third parties may use cookies, alone or in conjunction with web beacons or other tracking technologies, to collect information about you when you use our Website or when you navigate to their websites. The information they collect may be associated with your personal information, or they may collect information, including personal information, about your online activities over time and across different websites, applications, and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. This Data Protection Notice governs only information collected on the Website. When accessing Linked Websites, you should read the privacy notice published on the relevant Linked Website. The terms of our Data Protection Notice do not apply to Linked Websites. Please check these privacy notices before you submit any Personal Data to Linked Websites. We accept no liability in connection with any Linked Website, or any contract entered into with any third party on or through a Linked Website.

We do not control the privacy practices of these third parties. For example, we do not control whether or how third parties may use your information or may use tracking technologies with respect to your

information. If you have any questions about a third party's privacy practices or about an advertisement or other targeted content or how any third party may collect or use your information, you should contact the responsible third party directly.

## 6. DISCLOSURE OF YOUR INFORMATION

This section describes those within CFW and outside CFW with whom we may share your Personal Data ("Recipients"):

RECIPIENT
<p><b>CFW</b></p> <ul style="list-style-type: none"> <li>Affiliates and shareholders of the Company</li> </ul>
<p><b>Other Recipients</b></p> <ul style="list-style-type: none"> <li>Regulatory authorities and law enforcement agencies (where we are under a duty to disclose or share your Personal Data in order to comply with any legal or regulatory obligation or request);</li> <li>External advisors e.g. lawyers, accountants and auditors (as necessary to protect CFW's legitimate and legal interests) to protect the rights, property or safety of CFW, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction; and</li> <li>Service providers for IT service purposes, and to support the functioning of our Website.</li> </ul>

## 7. Transfer of your Personal Data

Website users resident in the European Union should note that your Personal Data may be transferred to certain Recipients (mainly our external service providers) who are located outside the European Economic Area ("EEA") in countries with laws and practices that do not contain equivalent data protection rights for your Personal Data (i.e. the US). Where such transfers occur, we ensure that appropriate safeguards are in place by ensuring that: a) transfers do not occur without our prior written authority; and b) that an appropriate transfer mechanism, such as Module 2 of the Standard Contractual Clauses (as approved by the European Commission) or an adequacy decision of the European Commission, is in place to protect your Personal Data. If you would like to find out more about any transfers which affect your Personal Data, please contact us by e-mailing [Compliance@teamcfw.com](mailto:Compliance@teamcfw.com).

## 8. RETENTION OF YOUR PERSONAL DATA

In general, we will keep your Personal Data for as long as is necessary for the purposes for which it was obtained from the date of collection or, where you enter into a contractual arrangement with us, following the end of the performance of our contract (which may be up to 7 years in some cases).

Please note that in certain circumstances, we may hold your data for a longer period, for example, if we are processing an ongoing claim or believe in good faith that the law or a relevant regulator may reasonably, in our view, expect or require us to preserve your Personal Data.

## 9. YOUR RIGHTS AND HOW TO EXERCISE THEM

This table below sets out the rights which you have to address any concerns or queries with us about our processing of your Personal Data. Note that in certain circumstances, these rights may not be absolute. You can exercise any of these rights by submitting a request in writing to us. Contact details are set out at section 10 of this notice.

You also have the right to lodge a complaint with your local data protection supervisory authority. For further information see your local supervisory authorities website or reach out to them for contact information.

Right	Further Information
<b>Right of Access</b>	<p>You have the right to request a copy of the Personal Data held by us about you and to access the following information in relation to the processing of your Personal Data:</p> <ol style="list-style-type: none"> <li>(1) the purposes of processing;</li> <li>(2) the categories of Personal Data concerned;</li> <li>(3) the recipients of your Personal Data;</li> <li>(4) the period for which your Personal Data will be stored;</li> <li>(5) the existence of your right to lodge a complaint with the Office of the Data Protection Commissioner; and</li> <li>(6) the source of your Personal Data.</li> </ol> <p>We will only charge you for making such an access request where we feel your request is unjustified or excessive.</p>
<b>Right to Rectification</b>	<p>You have the right to request that we amend any inaccurate Personal Data that we have about you.</p>
<b>Right to Erasure</b>	<p>You have the right to ask us to erase your Personal Data where:</p> <ol style="list-style-type: none"> <li>(1) it is no longer necessary to perform the contract;</li> <li>(2) you withdraw your consent and there is no other legal basis permitting us to process your Personal Data;</li> <li>(3) you object and we have no overriding legitimate grounds;</li> <li>(4) your Personal Data have been unlawfully processed; or</li> <li>(5) your Personal Data must be erased to comply with a legal obligation.</li> </ol> <p>Please note that in some cases erasure may not be complete or immediate to the extent that some of your Personal Data may be required in order for the Website to function properly.</p>
<b>Right to Restriction of Processing</b>	<p>You have the right to ask us to restrict processing your Personal Data in the following situations:</p> <ol style="list-style-type: none"> <li>(1) where you contest the accuracy of your Personal Data;</li> <li>(2) where the processing is unlawful, and you do not want us to delete your Personal Data;</li> <li>(3) where we no longer need your Personal Data for the purposes of processing, but you require the data in relation to a legal claim;</li> </ol> <p>or</p>

	<p>(4) where you have objected to us processing your Personal Data pending verification as to whether or not our legitimate interests override your interests or in connection with legal proceedings. When you exercise this right, we may only store your Personal Data. and may not further process the data unless you consent, or the processing is necessary in relation to a legal claim or to protect the rights of another person or legal person or for reasons of important public interest.</p>
<b>Right to Data Portability</b>	<p>You may request us to provide you with your Personal Data which you have given us in a structured, commonly used and machine-readable format and you may request us to transmit your Personal Data directly to another data controller where this is technically feasible.</p> <p>This right only arises where:</p> <ol style="list-style-type: none"> <li>(1) we process your Personal Data with your consent or where it is necessary to perform our contract with you; <b>and</b></li> <li>(2) the processing is carried out by automated means.</li> </ol>
<b>Right to Object</b>	<p>You have a right to object at any time to the processing of your Personal Data where we process your Personal Data on the legal basis of pursuing our legitimate interests.</p>
<p><b>If you have any concern in relation to how your Personal Data is used or processed, you have the right to lodge a complaint with your local Supervisory Authority.</b></p>	

We will provide you with information on any action taken upon your request in relation to any of these rights without undue delay and at the latest within one month of receiving your request. We may extend this up to two months if necessary, however, we will inform you if this arises.

## 10. CHANGES TO THIS NOTICE AND QUESTIONS

If we amend this notice, in whole or part, at our sole discretion, any changes will be effective immediately upon communicating the revised notice to you.

If at any time we decide to use your Personal Data in a manner significantly different from that stated in this notice, or otherwise disclosed to you at the time it was collected, we will notify you and you will have a choice as to whether or not we use your information in the new manner.

If you have any questions, comments or concerns about the way your Personal Data are being used or processed by the Company, please submit your question, comment or concern in writing to [compliance@teamcfw.com](mailto:compliance@teamcfw.com).